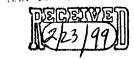




February 15, 1999

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Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 "C" Street SW
Washington, DC 20204



Section 403(r)(6) Notification

Dear Sir or Madam:

In accordance with the requirement of section 403(r)(6) of the Federal Food, Drug and Cosmetic Act, **Leiner Health Products** notifies the FDA that it has begun using the following phrase and statement:

OPCs That Support Antioxidant Activity

Grape Seed extract and Grape Skin are among the richest sources of proanthocyanidins, bioflavonoids that may limit damage by free radicals and help to keep artery walls flexible.* Grape Skin also contains the compound Resveratrol.

on the following product:

Tree of Life® Grape Seed +

Very truly yours,

Leiner Health Products

Gale Bensussen, President

cc: Michael Bradley, Director of Regulatory Affairs William Cochran, Manager of Regulatory Affairs

> LET 3187 63819